

UNITED STATES DISTRICT COURT

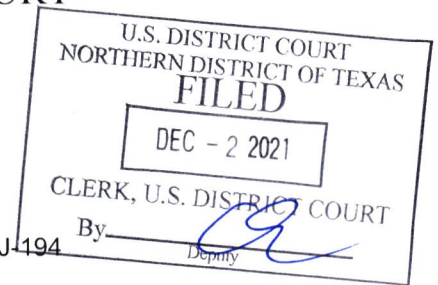
for the  
Northern District of Texas

United States of America  
v.

Carlos Gomez Alonso

*Defendant(s)*

Case No. 2:21-MJ-194



CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 1, 2021 in the county of Potter in the  
Northern District of Texas, the defendant(s) violated:

*Code Section*

Title 21, United States Code,  
Sections 841(a)(1), 841(b)(1)(C)  
and 846.

*Offense Description*

Conspiracy to Distribute and Possession with Intent to Distribute Cocaine

This criminal complaint is based on these facts:

see attached affidavit in support of complaint.

☒ Continued on the attached sheet.



*Complainant's signature*

John Carson, DEA SA

*Printed name and title*

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone  
(specify reliable electronic means).

Date: \_\_\_\_\_

*Judge's signature*

City and state: Amarillo, Texas

Lee Ann Reno, U.S. Magistrate Judge

*Printed name and title*

No. 2:21-MJ-194

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, John Carson, being duly sworn, depose and state:

1. I am a Special Agent assigned to the Drug Enforcement Administration (DEA) in Amarillo, Texas. I have been so employed for approximately five (5) years with the Drug Enforcement Administration. As part of my duties as a Special Agent, I investigate criminal violations related to narcotics trafficking and illegal drug smuggling. I have been involved in several investigations of illegal contraband and have specialized training and knowledge in investigating the illicit smuggling, transportation, and trafficking of narcotics in violation of Title 21, United States Code, Section 841(a)(1).

2. This affidavit is made in support of a complaint and arrest warrant for Carlos GOMEZ ALONSO. I am familiar with the information contained in this affidavit based upon my own personal investigation, as well as conversations with other law enforcement officers involved in this investigation.

3. On December 1, 2021 the DEA Amarillo Resident Office and Potter County Sheriff's Office executed a federal search warrant at the Las Alazanas Bar located at 2800 Amarillo Blvd East in Amarillo, TX. Present during the search warrant was GOMEZ ALONSO. GOMEZ was detained pursuant to the search warrant and searched. In a plastic container GOMEZ ALONSO had 25 small plastic baggies containing a powder substance believed to be cocaine. Deputy Barron from the Potter County Sheriff's Office mirandized and interviewed GOMEZ ALONSO. In the interview, GOMEZ ALONSO admitting to selling cocaine and admitted to receiving around an ounce per week for the last 2 years to sell through at the bar. While being booked into the Randall County Jail, additional baggies of white powder were located in another plastic container inside GOMEZ ALONSO's pants pocket. In addition to what was on GOMEZ ALONSO's person, more baggies of suspected cocaine were found near the bar area inside the Las Alazanas bar. An Amarillo Police Department undercover agent has purchased cocaine on multiple occasions since August of 2021 from employees at the bar.

4. The baggies of cocaine on GOMEZ ALONSO's person were field tested and tested positive for the presence of cocaine. The total weight of the cocaine was approximately 25 grams which is consistent with distribution as opposed to someone's personal use.

In addition, the manner in which the baggies were packaged was consistent with distribution. The baggies were packaged for individual sale.


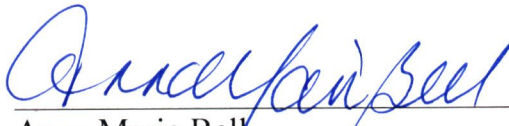


John Carson  
DEA Special Agent

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

12-2-21 at Amarillo Tx  
Date City and State

Lee Ann Reno, U.S. Magistrate Judge  
Name and Title of Judicial Officer

  
Signature of Judicial Officer  
Anna Marie Bell  
Assistant U.S. Attorney